

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JESSE HAMMONS,)	
)	
Plaintiff,)	
v.)	Case No. 1:20-cv-02088-DKC
)	
UNIVERSITY OF MARYLAND MEDICAL SYSTEM)	
CORPORATION, et al.)	
)	
Defendants.)	
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THIRD CONSENT MOTION FOR EXTENSION OF TIME TO FILE FEE MOTION

Plaintiff Jesse Hammons hereby moves this Court for a twenty-eight (28) day extension of time to file his Motion for Attorney’s Fees. In support, Plaintiff states as follows:

1. On March 13, 2023, this Court entered judgment for Plaintiff. ECF No. 133.
2. This Court then granted the Parties’ joint motion to extend the deadline for Plaintiff’s Motion for Attorney’s Fees until 21 days after the time to appeal expired, or the Fourth Circuit issued its mandate on any appeal taken. *See* ECF Nos. 134, 135.
3. Plaintiff appealed the dismissal of his constitutional claims, and Defendants filed a conditional cross-appeal of this Court’s ruling on Plaintiff’s Section 1557 claim. *See generally Jesse Hammons v. UMMS*, Nos. 23-1394, 23-1452 (4th Cir.).
4. On June 24, 2025, the Fourth Circuit dismissed both appeals, *see* ECF No. 148, and on July 16, 2025, the Fourth Circuit issued its mandate, *see* ECF No. 149.
5. Since the Fourth Circuit issued its mandate, the Parties have engaged in negotiations to resolve Plaintiff’s attorney’s fees, which would avoid the need for motion practice and conserve this Court’s resources. These negotiations are ongoing.

6. To facilitate these negotiations, Plaintiff requested, and this Court granted, two extensions of time to file his Motion for Attorney's Fees. *See* ECF Nos. 150, 151, 152, 153.

7. Since that time, the Parties have continued to engage in negotiations to resolve Plaintiff's attorney's fees. Specifically, the Parties exchanged several written communications, and met and conferred on September 2 and September 19, 2025 to discuss resolution. While the Parties have been unable to reach agreement, the Parties believe that further negotiations would be productive.

8. This Motion is made for good cause and not for the purpose of undue delay, and is being submitted before the expiration of the current deadline for Plaintiff's Motion for Attorney's Fees.

9. Defendants' counsel has consented to this extension.

10. A proposed order is attached.

WHEREFORE, Plaintiff respectfully request a twenty-eight-day extension of time to file his Motion for Attorney's Fees until October 31, 2025.

Dated: September 30, 2025

Respectfully submitted,

/s/ Louis J. Ebert

Louis J. Ebert (Fed. Bar No. 02031)

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Counsel for Plaintiff Jesse Hammons

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2025, Defendants' counsel was served with the foregoing document through the Court's Electronic Case Filing System.

/s/ Louis J. Ebert

Louis J. Ebert